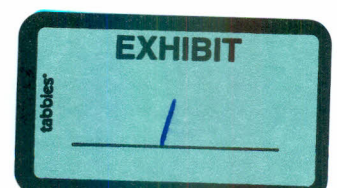


DECLARATION OF ROBERTO GALLEGOS

I, Roberto Gallegos, declare the following to be true and correct:

1. My name is Roberto Gallegos. I am over the age of eighteen years, have never been convicted of a felony or crime of moral turpitude and am otherwise competent to make this affidavit. I am authorized to make this affidavit and have personal knowledge of the facts contained herein and those facts are true and correct.
2. I am the Manager for the Coiled Tubing Division of C.C. Forbes, LLC. In my position as a Manager I am familiar with C.C. Forbes' business and its divisions.
3. C.C. Forbes has a Rig Division and a Coiled Tubing Division. The Rig Division and Coiled Tubing Division are distinct business units with each providing different services; they do not share yards, they use different equipment, they have different management and each hire their own employees.
4. I am the Manager for the Coiled Tubing Division. The Coiled Tubing Division has one rig yard located in Pleasanton, Texas. I make decisions relating to employees of the Coiled Tubing Division, including the hiring and firing of employees, their discipline, hours of work, schedules and the other day to day decisions relating to the management of the Coiled Tubing Division.
5. The Rig Division has multiple rig yards. I do not manage any of the Rig Division rig yards nor do I make decisions relating to the hiring, firing, or discipline of Rig Division employees, their hours of work, schedules or any other decisions relating to the Rig Division.
6. The Coiled Tubing Division uses equipment that is capable of providing services on higher pressured wells. Because the services of the Coiled Tubing Division and Rig Division are used in different circumstances, there are very few occasions when the rigs of the different divisions would be used at the same location. Since I have worked in the Coiled Tubing Division I do not recall any times when this has occurred.
7. The Coiled Tubing Division provides well services to clients using a coiled tubing unit. The coiled tubing units have one continuous string of pipe that is up to 23,500 feet in length. It is very different from the equipment used by the Rig Division. Attached is a picture of a coiled tubing unit. A coiled tubing unit crew generally consist of 4-5 people: a supervisor, a coiled tubing operator, a pump operator and 1-2 helpers.
8. The Rig Division uses a work over rig with a large derrick and also uses other specialized equipment, such as swab units. The Rig Division has employees who operate the work over rigs and their specialized equipment. The Rig Division employees work in the air on a derrick handling pipe; they handle the individual joints of pipe that are about 30 feet in length that need to be connected/disconnected. They have to use elevators to lift the pipe,



heavy tongs to make the connections and slips to keep the pipe from dropping into the well bore.

9. The Coiled Tubing Division employees do not operate work over rigs or the other specialized equipment used in the Rig Division and they do not work in the air on a derrick. Coiled Tubing Division employees do not use elevators, tongs or slips.
10. I, as the Manager of the Coiled Tubing Division, along with my supervisors, make decisions relating to hiring and firing of employees in the Coiled Tubing Division. We discipline the employees, set the employees hours of work and schedules and make the other day to day decisions relating to their employment. Office personnel in the Coiled Tubing Division have set hours, all the others are scheduled based on business needs.
11. I am not involved in the management or supervision of the employees in the Rig Division. Neither I nor my supervisors make decisions relating to hiring, firing or discipline of Rig Division employees, we do not set their hours of work nor their schedules and we do not make any decisions relating to their management or supervision.
12. The pay for employees of the Coiled Tubing Division varies by job duties. Some of the employees of the Coiled Tubing Division do not and have not received any bonus; they are not paid a daily bonus.
13. The Managers and supervisors in the Coiled Tubing Division are not involved in setting the pay for employees of the Rig Division. I do not how much employees in the Rig Division are paid and I do not know whether they receive bonuses.
14. Some employees in the Coiled Tubing Division stay at the Pleasanton yard's 'man camp.' This lodging is not part of an employees' compensation. Many employees do not stay at the man camp.
15. The Coil Tubing Division and Rig Division do not share employees. Their work is different, the employees for the different divisions are not interchangeable. I am not aware of any instances when employees of the Rig Division worked for the Coil Tubing Division nor instances when employees of the Coil Tubing Division worked for the Rig Division.
16. Below is a general description of the duties of the non-management/non-supervisory employees of the Coiled Tubing Division:

CLERK: Process status change and payroll forms. Manages tickets and purchase order process. Retrieves data and correspondence from field process and files in timely manner. Enters daily field tickets, audits, and prints invoices. Maintains fuel logs. Ensures all invoices, quotes, tickets, and purchase orders have been received and processed.

COIL TUBING OPERATOR: Operates the coil unit. Runs pipe in and out of the hole. Assist with rig up and rig down

PUMP OPERATOR: Operates fluid pumps and nitrogen pumps. As needed assist with taking care of fuel and equipment.

HELPER: Takes care of the ground. Helps with the rig-up and rig-down. Takes care of fuel, equipment, and tool trailer. Helps out where needed.

MECHANIC: Maintenance and repair of all the equipment from oil changes to electrical.

TECHNICIAN: Works on all computer issues whether in the yard on the units. Will work on electrical on the units.

17. The following individuals worked in the Coil Tubing Division and held the following positions:

Peter Keppard, Alonso Robles, Hector Vallejo, and Guillermo Trevino were Pump Operators.

Trinidad Avila and Humberto Castillo were Helpers.

Hector A Vallejo held an hourly position of Coil Tubing Operator.

18. I am aware of Texas Energy; it is a separate company from C.C. Forbes and provides different services, such as vacuum trucks and fluids. I have no control over Texas Energy or its employees and Texas Energy does not control my employees

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 12 day of November 2015.



Roberto Gallegos

